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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

**STEPHAN CAMPBELL, on behalf of  
himself and all others similarly situated.**

Plaintiff,  
v

## EVERYTHING BREAKS, INC.

## Defendant

Case No.: 2:23-cv-00861-GMN-EJY

**JOINT NOTICE OF PENDING  
SETTLEMENT AND  
JOINT MOTION FOR STAY OF  
DISCOVERY DEADLINES AND  
DEADLINES ORDERED BY THE  
COURT IN ITS JULY 30, 2024,  
HEARING**

1           **TO THE COURT, EACH PARTY AND THEIR ATTORNEY OF  
2 RECORD:**

3           Plaintiff Stephan Campbell (“Plaintiff”), individually and as representative  
4 of a proposed Settlement Class and Defendant Everything Breaks, Inc. (collectively  
5 referred to as the “Parties”), by and through their attorneys of record, notify the Court  
6 that the Parties have reached an agreement in principle to fully, finally, and forever  
7 resolve, discharge, and release all rights and claims in, or that could have been  
8 asserted in, the above-referenced class action, subject to a mutually acceptable  
9 settlement agreement, preliminary and final approval of the class settlement, and  
10 dismissal of the action with prejudice by the Court. The Parties are presently  
11 memorializing the class settlement in a comprehensive settlement agreement and  
12 related documents, which the Parties will endeavor to file with the Court as part of  
13 a motion for preliminary approval within forty-five (45) days of this Joint Notice.

14           The Parties further move the Court for entry of an Order staying the discovery  
15 deadlines and all deadlines ordered by the Court in its July 30, 2024, hearing for  
16 forty-five (45) days while the Parties finalize the class action settlement and related  
17 documents, including the aforementioned motion for preliminary approval. As  
18 grounds and good cause therefor, the Parties state that:

- 19           1. The Parties have reached a proposed class settlement. The proposed class  
20           settlement will fully, finally, and forever resolve, discharge, and release all  
21           rights and claims in, or that could have been asserted in, the above-referenced  
22           action.
- 23           2. The Parties are presently memorializing the class settlement in a  
24           comprehensive settlement agreement and related documents, which the  
25           Parties will endeavor to file with the Court as part of a motion for preliminary  
26           approval within forty-five (45) days of this Joint Motion for Stay of  
27           Proceedings.

1 WHEREFORE, Plaintiff and Defendant respectfully request that this Court  
2 stay proceedings for forty-five (45) days while the Parties finalize the class  
3 settlement agreement and related documents.

4

5 Dated: August 6, 2024 Respectfully submitted,

6 /s/ Chris R. Miltenberger  
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29  
30 -and-

31 SEAN P. FLYNN (SBN: 15408)  
32 TOMIKO A. ORTIZ (SBN: 16599)

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8                           Attorneys for Defendant,  
9                           *EVERYTHING BREAKS, INC.*

10                          **CERTIFICATE OF SERVICE**

11                          I certify that on the date below I electronically filed the foregoing document  
12                          and that it is available for viewing and downloading from the Court's CM/ECF  
13                          system, and that all participants in the case are registered CM/ECF users and that  
14                          service will be accomplished by the CM/ECF system.

15                          BY: /s/ Chris R. Miltenberger  
16                          Chris R. Miltenberger